

Stephen Richardson

From: Deana Burn <Deana.Burn@planning.nsw.gov.au>
Sent: Wednesday, 17 December 2014 9:56 AM
To: Stephen Richardson; john.studdert@manildra.com.au
Cc: Christopher Ritchie
Subject: FW: Proposed Modification - Assessment Requirements

Hi Steve, John

The Department received the request for Secretary's Environmental Assessment Requirements (SEARs) for the construction of an additional flour mill at the Shoalhaven Starches facility at Bomaderry.

As discussed, it is the Department's preference that the new flour mill be assessed via a modification to the project approval for the Ethanol Expansion Project (06_0228), as this approval consolidated all previous development consents into a single approval for the site; and Shoalhaven Starches are in the process of preparing a modification application for other aspects of the development (described in my email below). The Department recommends that Shoalhaven Starches lodge a single modification application that assesses all proposed plant relocations, layout amendments and new infrastructure. I note, following discussions with Chris earlier this week, Starches may seek to lodge a separate application for the new stack on the DDGS pellet plant in order to process this component urgently.

I have reviewed the Preliminary Environmental Assessment for the Proposed Additional Flour Mill, dated November 2014 and request that in addition to the requirements provided below, the Environmental Impact Statement includes:

- Detailed air quality, odour and noise assessments in accordance with relevant EPA guidelines. For the relocation of approved infrastructure, the assessments need to provide a comparative analysis against the approved impacts of the ethanol expansion project. For the new flour mill, the assessment needs to include cumulative impacts from the approved development + the new flour mill.
- In relation to hazards, as noted below, the assessment should include updated hazard studies that address all new/relocated/modified infrastructure. The purpose of requesting these studies as part of the environmental assessment is to minimise the post-approval requirements and enable construction to commence following approval (subject to satisfying any other pre-construction conditions).
- Flooding and riverbank stability – assessment of the impacts on riverbank stability, proposed mitigation measures and details of emergency bank stabilisation works in the vicinity of the modification.

As stated below, it is important that all proposed modifications are clearly described and shown on clear and legible site plans.

If you have any questions in relation to these requirements, feel free to call me on 9228 6453. Both Stefan Press at the EPA and David Zerafa at NOW are also available and happy to discuss the specific environmental assessment requirements directly.

Regards,
Deana.

From: Deana Burn
Sent: Wednesday, 19 November 2014 5:40 PM
To: Steve@cowmanstoddart.com.au; John.Studdert@manildra.com.au
Cc: Christopher Ritchie
Subject: Proposed Modification - Assessment Requirements

Hi Stephen, John

Thank you for your letters dated 30 October 2014 and 6 November 2014 describing proposed modifications to the Shoalhaven Starches factory at Bomaderry.

I understand from your letters that the proposed modifications include:

- relocation of the approved packing plant and container storage area;
- relocation of a product dryer (referred to as No. 5 Product Dryer);
- amended layout and design of the approved staff carpark; and
- construction of a stack (48m high) to disperse odours from the approved DDGS pellet plant.

As outlined in your letter, the environmental assessment for the modification should include detailed assessments of:

- air quality and odour;
- noise;
- flooding;
- traffic;
- hazards;
- acid sulphate soils
- contamination; and
- riverbank stability.

The Department also requests that the environmental assessment clearly describes and assesses the following:

- a clear description of the proposed modifications, approved works, constructed and yet to be constructed components of the development. For example the figures submitted with your letters show four large storage silos and two product dryers. Please confirm that these are approved components to be relocated and show copies of the approved plans with different colours for approved components, new components, modified/relocated components and approved but not constructed components;
- justification for the modification;
- describe any other related approvals, for example, did Council grant approval for a smaller packing plant on the southern side of Bolong Road? Was this constructed? How will this approval be affected by the proposed modification, will it be surrendered?
- in relation to hazards, the Department requests that your application is supported by the following studies. The studies should also incorporate/respond to comments provided on these studies by the Department in October 2014:
 - a construction safety study for the modification;
 - an updated site-wide fire safety study;
 - a hazard and operability study for the modification;
 - an updated preliminary hazard analysis for the modification.

Should you have any questions regarding the above, please contact me on 9228 6453.

Regards,
Deana.

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You should scan any attached files for viruses.

Stephen Richardson

From: Brian Hanley <brian.hanley@manildra.com.au>
Sent: Friday, 30 September 2016 2:31 PM
To: Stephen Richardson; mark@meeng.com.au; John Studdert; Ming Leung; Matthew Handicott; Greg Murphy; Lou Reali; Peter Gerber
Subject: FW: Proposed Modification - Assessment Requirements Flour Mill B

Regards

Brian Hanley

Manager

Energy & Sustainability

Manildra Group

36 Bolong Rd, Bomaderry, NSW, 2541

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From: Deana.Burn@planning.nsw.gov.au [mailto:Deana.Burn@planning.nsw.gov.au]
Sent: Friday, 30 September 2016 2:29 PM
To: Brian Hanley <brian.hanley@manildra.com.au>
Cc: doris.yau@planning.nsw.gov.au
Subject: FW: Proposed Modification - Assessment Requirements

Hi Brian

As discussed and confirmed with Doris, the Construction Safety Study and HAZOP are not required until after determination. If the HAZOP and CSS are completed during the EA stage and the detailed design changes later, the studies would need to be re-done or updated, so its best to wait until after determination.

Regards,
Deana.

From: Deana Burn
Sent: Wednesday, 17 December 2014 9:55 AM
To: steve@cowmanstoddart.com.au; john.studdert@manildra.com.au
Cc: Christopher Ritchie
Subject: FW: Proposed Modification - Assessment Requirements

Stephen Richardson

From: Stefan Press <Stefan.Press@epa.nsw.gov.au>
Sent: Tuesday, 13 September 2016 5:28 PM
To: Stephen Richardson
Cc: Brian Hanley (brian.hanley@manildra.com.au); John Studdert (John.Studdert@manildra.com.au); Deana.Burn@planning.nsw.gov.au; Julian Thompson
Subject: RE: Request for Requirements for EA, Proposed Modification Application to MP06_0228, Shoalhaven Starches Expansion Project, Proposed New Flour Mill (B), Shoalhaven Starches, Bolong Road, Bomaderry
Attachments: FW: Proposed Modification - Assessment Requirements

Hi Steve

Thank you for your email and apologies for the delay in getting back to you.

The EPA has reviewed the submitted scoping submission for the latest proposed modification. We note it identifies that Shoalhaven Starches proposes to complete an Air Quality Impact Assessment and Noise Impact Assessment for the proposal as well as contamination assessment in the areas of construction. We are satisfied with this proposed level of assessment, and subject to these impact assessments being completed in accordance with the relevant EPA guidance (*Technical Framework for Assessment and management of Odour from Stationary Sources* (DEC, 2006) and *NSW Industrial Noise Policy* (EPA, 2001) and that a comparative analysis against the originally approved impacts of the ethanol expansion project is provided, we have no further requirements in relation to the proposal – this is as per the previously provided DPE requirements for the new flour mill in the attached email.

I trust this is of assistance but should you wish to discuss further please feel free to get back in contact.

Regards

Stefan Press

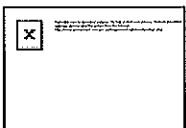
Acting Unit Head (North) – South East Region

NSW Environment Protection Authority

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stefan.press@epa.nsw.gov.au www.epa.nsw.gov.au @EPA NSW

Report pollution and environmental incidents 131 555 (NSW only) or +61 2 9995 5555



From: Stephen Richardson [mailto:Steve@cowmanstoddart.com.au]
Sent: Wednesday, 24 August 2016 12:09 PM
To: Stefan Press <Stefan.Press@epa.nsw.gov.au>
Cc: brian.hanley@manildra.com.au; John Studdert <John.Studdert@manildra.com.au>; mark@meeng.com.au
Subject: Request for Requirements for EA, Proposed Modification Application to MP06_0228, Shoalhaven Starches Expansion Project, Proposed New Flour Mill (B), Shoalhaven Starches, Bolong Road, Bomaderry

Dear Stefan,

I refer to previous correspondence between the EPA, Shoalhaven Starches and our firm in connection with Shoalhaven Starches modifications to its approved development at its Bolong Road, Bomaderry factory site.

Shoalhaven Starches Pty Ltd. now intend to proceed and seek approval to construct a new Flour Mill B which will be sited immediately adjoining and to the north of the existing Flour Mill on the site. It is anticipated that the new Flour Mill will produce in the order of 442,000 tonnes of flour per annum, increasing the amount of flour produced on site in total to 842,000 tonnes per annum.

The Modification Proposal will not however result in an overall increase in the amount of flour processed on the site, but rather will result in a reduction in the amount of flour that is transported to the site by rail for processing. The proposed new Flour Mill will process 11,300 tonnes per week of grain producing 8,500 tonnes per week of flour. In conjunction with the flour already processed on the site, this will mean that 16, 200 tonnes of flour will be able to be produced at the Bomaderry plant per week, with the remaining 3, 800 tonnes of flour being transported by rail to the site from Manildra. The establishment of an additional new Flour Mill at the Bomaderry site will enable subsequent spare capacity at the Company's Flour Mill at Manildra to be devoted to the production of higher grade flour therefore increasing export opportunities for the Company.

This project will constitute modifications to the existing Shoalhaven Starches Expansion Project (SSEP) approved by the NSW Minister for Planning (MP06_0228). The purpose of this submission is to consult with the EPA as the site is subject to a licence under the Protection of the Environment Operations Act.

Attached for your information is a copy of the submission which has been submitted to the NSW Department of Planning & Environment seeking the Departments requirements for the preparation of the Environmental Assessment for this modification proposal. This submission provides background information and plans detailing the proposal.

If the EPA have any comments or requirements in relation to this matter I would appreciate it if you could supply your comments to our firm as soon as possible.

If you require any further information in relation to this matter please do not hesitate to contact me.

Regards

Stephen Richardson
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Australian Government
Department of Defence
Estate and Infrastructure Group

David Harrison
Acting Director Land Planning & Regulation
Estate Planning Branch
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Mr Stephen Richardson
Cowman Stoddart Pty Ltd.
PO Box 738
Nowra NSW 2541

Dear Mr Richardson

RE: Shoalhaven Starches – Modification to Shoalhaven Starches Expansion Project

The Department of Defence (Defence) would like to thank Cowman Stoddart Pty Ltd for referring this matter to Defence. Defence understands the applicant, Shoalhaven Starches Pty Ltd, is proposing to undertake further modifications to its approved development at its Bolong Road, Bomaderry factory site which will result in parts of its development exceeding a height of 30 metres.

Defence has assessed the proposed modification with regard to their potential impact on operations at HMAS *Albatross*.

There is an ongoing need to obtain and maintain accurate information about tall structures. The risk posed by a tall structure to aircraft safety can be minimised if information on the tall structure is conveyed to pilots so that they can fly at a safe margin above the structure. Airservices Australia is responsible for recording the location and height of tall structures. The information is held in a central database and relates to the erection, extension or dismantling of tall structures the top of which is:

- a. 30 metres or more above ground level - within 30 kilometres of an aerodrome, or
- b. 45 metres or more above ground level elsewhere.

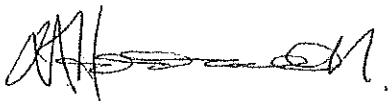
The proposed modifications will meet the above definition of tall structure. Defence therefore requests the applicant provide Airservices Australia with "as constructed" details. The "as constructed" information can be emailed to Airservices Australia via vod@airservicesaustralia.com.

Should LED obstruction lighting be provided to the proposed modifications, then Defence requests the frequency range of the LED light emitted fall within the range of wavelengths 655 to 930 nanometres, thus being visible to persons using night vision devices.

Defence has no concerns at this time with the proposal subject to the above requests being met.

Should you have any questions regarding this matter my point of contact is Ms Sam Pedram who can be contacted on (02) 6266 8513 or via email at DSRGIDEP.ExecutiveSupport@defence.gov.au

Yours faithfully

A handwritten signature in black ink, appearing to read 'David Harrison', with a stylized flourish at the end.

David Harrison

Acting Director Land Planning & Regulation

30 September 2016

Stephen Richardson

From: Andrew Lissenden <Andrew.Lissenden@shoalhaven.nsw.gov.au>
Sent: Tuesday, 20 September 2016 8:09 AM
To: Stephen Richardson
Cc: 'Deana.Burn@planning.nsw.gov.au'
Subject: Proposed Modification to Shoalhaven Starches Expansion Project relating to the Proposed New Flour Mill - Preliminary Council Comments

Hi Stephen:

Further to your email dated 24 August 2016 please find below comments/suggested requirements from Council for the preparation of the Environmental Assessment in relation to the above matter. In summary, Council concurs with the comments made in your letter in relation to visual impacts, SEPP 55, acid sulfate soils, works in proximity to the adjoining watercourses and need to consult with the NSW Office of Water/Department of Defence. It is also noted that the NSW EPA as the regulatory authority will provide comments in relation to noise and odour/air quality. The issues that Council are specifically concerned with are discussed below.

1. Traffic/Access: The application will need to be supported by a Traffic Impact Assessment (TIA) to enable Council to understand how the proposal will operate and assess impacts/additional works that may be required. The TIA should include, but not be limited to, the following:
 - a. Heavy vehicle movements and their associated impact on existing access points and whether such access points to the site will be sufficient to accommodate the traffic generated by the modified proposal. This including any intersection treatment/ up grading of the access points and associated concept designs demonstrating compliance with relevant standards inclusive of any signage required;
 - b. Address the cumulative impact of what is currently occurring on the site and how the proposed changes will work together with the existing traffic movements to and from the overall site (including current and proposed traffic movements). All changes to vehicle access patterns and volumes need to be detailed and assessed accordingly. In addition, all existing approvals need to be considered in conjunction with the proposed application;
 - c. Turning path plans for all manoeuvring required in and out of the site. This including the Paper Mill site (Lot A DP 384559 and Lot 1 DP 130968) which the operator has been advised to include in relation to their proposed ongoing storage of material in existing effluent tanks on this site; and
 - d. An assessment of available sight distances at the access points to be used.

Please note that Council disagrees with the comment on Page 6 of your letter that states "*Shoalhaven Starches have undertaken a comprehensive upgrade to existing entrances to the Shoalhaven Starches factory site as well as the recently acquired former Dairy Farmers site to Bolong Road in accordance with the Project Approval as well as other approvals granted by Shoalhaven City Council*". As previously discussed with the operator and the Department of Planning and Environment some of the existing access works (e.g. Dairy Farmers site entrance) have not been completed in accordance with the project approval/to Councils satisfaction.

2. Flood: The application will need to be supported by an updated Flood Assessment that details the potential impacts that the proposed works will have on flood waters within and surrounding the locality, outline proposed mitigation measures, provide an updated flood emergency plan, and will need to provide information to demonstrate that the proposed modifications/new works can withstand the forces of flood waters, debris and buoyancy forces up to the 0.2% AEP flood event.
3. Shoalhaven Water: The application will need to provide a detailed water use analysis which shows current water use (both raw and treated) and projected water use following the modification.
4. Stormwater: The application will need to be supported by a concept stormwater plan. This should show/detail how and where the stormwater from the new works will be disposed of/discharged to.
5. Use of Paper Mill Land: The operator has separately advised Council that they are looking to utilise sections of the Paper Mill site for activities associated with Shoalhaven Starches. This modification should include details on what associated activities are planned to occur on the paper mill site.

6. Roads and Maritime Services (RMS): Council notes from previous discussions it has had with the RMS that they would like to be consulted as part of the applications assessment process. It is therefore recommended that a discussion be had with RMS prior to the formal lodgement of any future application.

Should you have any further questions in relation to the above please give me a call.

Regards

Andrew Lissenden
Development Co-ordinator
Shoalhaven City Council

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